

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA

v.

MARIA TERECHINA

a.k.a. "Maria Terechina Ulaj"

CASE NO. 2:10-cr-88

Judge Graham

FACTUAL STATEMENT

The United States of America, as represented by the United States Attorney for the Southern District of Ohio and the Assistant Attorney General for the Civil Rights Division of the United States Department of Justice, and Defendant MARIA TERECHINA hereby agree that the following facts, which form the factual basis for Defendant MARIA TERECHINA's entry of the plea of guilty, including relevant conduct, pursuant to Rule 11(b)(3) of the Federal Rules of Criminal Procedure, are true and correct, and that if this matter were to proceed to trial the United States would prove these facts beyond a reasonable doubt:

1. Beginning as early as May 1999, and continuing through December 2007, Defendant MARIA TERECHINA was a supervisor of business operations for several companies providing housekeeping and other services to hotels in the Columbus, Ohio, area in the Southern District of Ohio.
2. In 1999 and throughout the ensuing years, Defendant MARIA TERECHINA agreed with her co-conspirators in the said business operations to (1) employ alien laborers who were not authorized to work in the United States, (2) provide housing for said laborers, (3) transport said laborers to and from hotels and other work sites, (4) take steps to prevent immigration authorities from detecting said laborers, and (5) do all of this for commercial advantage and personal financial gain.

3. Defendant MARIA TERECHINA further agreed with her co-conspirators in these business operations to hold the passports and related immigration documents of laborers to ensure that they would continue their labor for the co-conspirators; Defendant MARIA TERECHINA further agreed with her co-conspirators to hold the passports and related documents as part of a scheme intended to cause the laborers to believe that if they did not perform labors and services their immigration status would suffer.
4. Defendant MARIA TERECHINA further agreed with her co-conspirators in the said business operations to defraud the United States by filing false tax returns.
5. To accomplish these agreed-upon objectives, and in order to maintain a cheap and compliant work force, Defendant MARIA TERECHINA and her co-conspirators, during the aforementioned years, committed hundreds of overt acts including the following:
 - a. Defendant MARIA TERECHINA's co-conspirators recruited and obtained laborers from unnamed co-conspirators in New York and elsewhere. The laborers came from, Russia, Estonia, Belarus, Ukraine, and other Eastern European nations.
 - b. Between 1999 and 2007, Defendant MARIA TERECHINA and her co-conspirators employed and supervised hundreds of laborers in the said business operations.
 - c. Defendant MARIA TERECHINA and her co-conspirators' businesses operated under such names as "B & M Best Service" (hereinafter "B & M") and "Sweep Smart Corp." Defendant MARIA TERECHINA's co-conspirators periodically changed the names of the businesses in an effort to elude law enforcement scrutiny.
 - d. Defendant MARIA TERECHINA knew that many of the laborers were illegal aliens and that many of the laborers were not authorized to work in the United States.
 - e. The laborers included L.K., an Estonian woman born in 1948, who worked for Defendant MARIA TERECHINA at various times between September 2000 and May 2002; N.Y.B., a Belarusian woman born in 1977, who


worked for Defendant MARIA TERECHINA in April 2002; and L.R.T., a Ukrainian woman born in 1984, who worked for Defendant MARIA TERECHINA in July and August 2005. None of these three laborers was authorized to work in the United States.

- f. Defendant MARIA TERECHINA's co-conspirators entered into written contracts with hotels in the Columbus, Ohio, area in the Southern District of Ohio. The hotels included the Westin Great Southern, Holiday Inn Express and Hilton.
- g. Defendant MARIA TERECHINA housed laborers at the Arbors of Dublin and Sawmill Village apartment complexes in Dublin, Ohio, sometimes in crowded conditions.
- h. Defendant MARIA TERECHINA and her co-conspirators told some of the laborers that they owed a debt (typically ranging from approximately \$600 to \$1,000) that would be paid through deductions from the laborers pay, often leaving the laborers with little money for the first month or more of their time in the United States.
- i. Defendant MARIA TERECHINA informed the laborers that they also owed additional sums of money for expenses related to housing, electricity, and daily rides to the hotel work sites.
- j. Nearly every day from 1999 to 2007, Defendant MARIA TERECHINA and her co-conspirators transported the laborers to work at the hotels as hotel maids and in other related positions.
- k. In April 2002, Defendant MARIA TERECHINA held the passports and immigration documents of N.Y.B.
- l. In July and August 2005, Defendant MARIA TERECHINA held the passports and immigration documents of L.R.T.
- m. Defendant MARIA TERECHINA profited from the harboring and transporting of the illegal alien laborers.
- n. On October 23, 2005, February 7, 2006, March 3, 2007, March 13, 2007, and March 15, 2007, Defendant MARIA TERECHINA signed and caused to be filed with the I.R.S., false Forms 941 Employer's Quarterly Federal Tax Returns understating the number of individuals employed by B & M

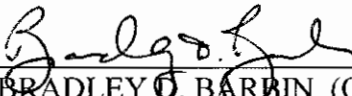
and understating the total wages paid to employees, thus fraudulently reducing the total amount of payroll taxes due from B & M and causing harm to the United States totaling \$185,087.27.

4/8/10

(Date)




MARIA TERECHINA
Defendant




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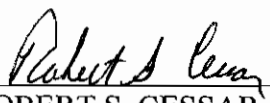


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